

Sunderland City Council Response to Matters, Issues & Questions

Matter 5 - Specific Housing Needs and Standards

1. The Justification for Affordable Housing Targets in Policy H2, Taking into Account Considerations such as Viability

1.1 Is the requirement for at least 15% of dwellings on major developments justified by the evidence base including that relating to viability?

As set out in section 7 of the SHMA (SD.23; para. 7.11; pg.110) the city has a net imbalance of 542 affordable units each year over the period to 2021. Viability work undertaken through The Whole Plan Viability Assessment (SD.60) tested a range of affordable housing levels with 15% being the point at which affordable housing could be viably achieved on all greenfield site typologies, with brownfield sites not being viable.

Whilst it is recognised that the viability assessment concludes that no affordable housing would be viable on all brownfield site typologies, in reality affordable housing has been and is continuing to be delivered on brownfield sites within the city. Between 2010 and 2016, of the sites that have delivered affordable housing through S106 agreements, 26% has been on brownfield sites, 38% on greenfield and 37% on mixed sites.

In recognition that the full 15% may not be deliverable on all sites, particularly brownfield sites, Policy H2 allows flexibility for the affordable housing requirement to be reduced down and the tenure split to be reviewed on a site by site basis to still enable the 15% to be provided.

1.1 Should the text of paragraph 6.23 relating to viability issues (or a summary) be included within Policy H2?

It is not considered that a reference to viability issues needs to be included within Policy H2. It is considered that Policy ID2 already covers site specific viability issues relating to delivery of affordable housing alongside the text in paragraph 6.23 (SD.1; pg. 60).

2. The Approach to Tenure-Split and Clustering Within Policy H2

2.1 Is the current tenure split (para. 6.18) justified?

The Council consider that the current tenure split is justified. As set out in the SHMA (SD.23; para. 7.14; pg. 112) a tenure split of 80% affordable rent and 20% intermediate tenure is sought in line with household preferences.

2.1 Will the requirement for small clusters affect the ability of registered providers to manage the housing stock, noting the proposed modification to para. 6.21 which refers to clusters being proportionate in size?

As set out in the Compliance Statement (SD.66, para. 8.129; pg. 269), it is considered that the requirement for small clusters will not affect the management of the housing stock as clusters better reflect the RP's requirements that housing they manage should be closely related for operational purposes.

3. The Approach to Affordable Housing Exception Sites

3.1 Is there justification for an affordable housing exception site policy?

The 2017 SHMA update (SD.23; Tables 7.7 & 7.8; pg. 111) considered the affordable housing needs of the city, breaking this down into sub-areas and wards. This evidence does not indicate any need for a rural exception policy, as such a policy of this nature has not been included within the Plan. The SHMA (SD.23; paras. 3.14-3.16; pgs. 36-37) demonstrates that house prices within Sunderland are amongst the lowest in the region and are largely affordable. Furthermore, the administrative area is largely urban by nature with very few areas that could be considered remote, which could benefit from a housing exception sites policy.

4. The Effectiveness of Policy H1 in Meeting the Need for a Mix of Dwellings, Including Larger Executive Dwellings and Those for Older People

4.1 Are the terms of Policy H1 in relation to accommodation for older people likely to be effective and are they justified?

As the number of older persons in the city is projected to increase by 42% by 2039 (Housing Strategy for Sunderland SP.13; pg. 14) it is important to ensure more choices are available to support this group with a variety of house types. This is in line with the SHMA (SD23; para. 7.47 and Table 7.16; pg. 120) suggesting a need to diversify the range of older persons housing provision.

It is recognised that not all sites are suitable for older persons housing, nor are the needs so great that a percentage requirement is needed on every major site, however the overall choice needs to be increased as such it is considered that the policy as worded will be effective in meeting the needs of older people, whilst ensuring deliverability.

Also through discussions with applicants on planning applications, the Council will seek to ensure the housing mix on new sites is consistent with the requirements of an area.

4.2 Is the requirement for developments to provide larger detached dwellings justified?

As set out in the SHMA (SD.23, para. 8.25, pg.129, Tables 7.4-7.5, pgs. 108-109, para. 7.6, pg. 106), there is a need to rebalance the housing stock within the city more closely with the need and aspirations of existing and future residents. As such the requirement for providing larger detached dwellings is considered justified.

5. The Density Provisions of Policy H1

5.1 Is criterion 1. iii of Policy H1, as proposed to be amended, likely to be effective in encouraging high density developments in suitable locations?

It is considered that the density provisions of Policy H1, at criterion 1.iii are effective, especially when read in conjunction with the explanatory text at para. 6.11 of the Draft Publication Plan (SD.1, pg. 59) and as such will assist in delivering high density developments in the most sustainable locations.

6. The Requirements of Policy H1 for Self-Build/Custom Build Housing

6.1 Is criterion 3 of Policy H1 and the explanatory text likely to be effective in encouraging self-build and custom-build housing plots, noting the proposed modification to para. 6.13?

It is considered that criterion 3 of Policy H1 and the explanatory text within para 6.13 – as proposed to be modified in the updated Schedules of Minor and Additional Modifications (MM22 and AM35 respectively) – are effective in encouraging self-build and custom house build plots as the policy supports people who want to build their own home, as well as seeking to identify appropriate small sites and the provision of self-build/custom build plots within general housing developments.

7. The Requirements of Policies H1 and BH2 for 10% Accessible/adaptable, Energy Efficient and Sustainably Designed dwellings and the Relationship to the Building Regulations

7.1 Is the requirement for 10% of dwellings on major developments to be accessible and adaptable (Building Regulations Part M4(2)) justified?

The Council has prepared the following evidence base documents to support the 10% adaptable requirement; Strategic Housing Market Assessment Addendum (2018) (SD.24), Technical Paper: Optional Standards – Accessible and Adaptable Homes (2018) (SP.16), Whole Plan Viability Assessment (With CIL Scoping (2017 (SD.60)) and the Sunderland City Council Post Consultation/ Pre Submission Viability Note (2018) (SD.61). Cumulatively, this evidence provides justification from both a need and viability perspective to support the 10 percent accessible and adaptable requirement set out in the CSDP.

7.2 Are the requirements of Policy BH2 in relation to energy efficiency, energy use, materials and sustainability information justified and effective, having regard to the scope of the Building Regulations?

The Council considers this Policy to be justified, having regard to the scope of the Building Regulations. Justification for the requirements of Policy BH2, including acknowledgement to the scope of the Building Regulations, is set out in paragraphs 11.51-11.57 of the Compliance Statement (SD.66; pgs. 373-374). The Policy is considered effective as its requirements will be delivered through the determination of planning applications, as is outlined in paragraph 11.59 of the Compliance Statement (SD.66; pg. 374).

8. The Justification for Applying the NDSS (Policy BH1)

8.1 Is the application of the NDSS through Policy BH1 justified taking into account evidence on need, viability and timing? JS/CJ

The Council considers the application of the NDSS through BH1 to be justified, as is set out in paragraphs 11.24-11.34 of the Compliance Statement (SD.66; pgs. 367-369). The need for the application of NDSS is established in chapter 3 of the Internal Space Standards Report (SD.25, pgs. 6-9).

The Council has proposed a one-year transition period which is considered to be proportionate and consistent with the Government's Planning Practice Guidance (56-020-20150327; para. 20) and reflects the transition period proposed by other recently adopted Plans (such as North Tyneside Council).

9. The Approach of Relying on the Unauthorised Encampment Policy (UEP) to Deal with the Need for a Stop-over Site Identified in the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA)

9.1 Is the approach set out above positively prepared, justified and effective?

The initial requirement for Gypsy and Traveller stop-over provision was identified through the GTAA (SD.26), however as set out in the GTAA Addendum 2018 (SD.27) and the Compliance Statement (SD.66; paras. 8.183-8.186; pg. 278) the UEP approach is considered appropriate based on the needs of this particular group, rather than allocating a site within the plan. The UEP meets the needs of the travelling community whilst taking into consideration the views of the local community and as such is considered to be positively prepared and justified.

As set out in para. 8.187 of the Compliance Statement (SD.66; pg. 279) the UEP is working as intended and there is no evidence at this stage for a permanent stop over site, however annual monitoring systems are in place and as such the UEP is considered effective.

9.2 What provision, if any, is there in the Sub-Region for a stop-over site?

Within the Sub-Region (South of Tyne – County Durham, Gateshead and South Tyneside) stop-over provision is available within County Durham for ten temporary stop-over areas, which are related to common travelling routes (mainly along the A688).

10. The Terms of Policy H4 (Travelling Showpeople, Gypsies and Travellers)

10.1 Is the allocation of travelling showpeople sites through Policy H4 Justified by the evidence base?

As set out in the Gypsy and Traveller and Travelling Showpeople accommodation Assessment (SD.26; Table 7.3; para. 7.18; pg. 43) there is a need for 33 plots for Travelling Showpeople over the plan period, with 15 plots required short-term (until

2022/23), as such the allocation of two sites within the Plan to accommodate this short-term need is considered justified.

Broad locations for growth have been identified to meet longer term needs, which is consistent with the requirements of the Government's Planning Policy for Traveller Sites (para. 10b; pg. 3).

10.2 Will the site-specific criteria for the allocations be effective, including in relation to the living conditions of proposed and neighbouring residents and access arrangements?

The Council has proposed a modification to Policy H4 in the updated Schedule of Main Modifications (MM24) to include site-specific criteria. It is considered that the criteria for the allocations is effective, including in relation to the living conditions of proposed and neighbouring residents and access arrangements.